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Attorney for Plaintiff
NATALIA TSUBERA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

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NATALIA TSUBERA,
Plaintiff,

No. 2:24-cv-01789-AC

STIPULATION AND [proposed]
ORDER FOR EXTENSION OF
TIME TO FILE PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT

v.

Michael O'Malley,
COMMISSIONER OF SOCIAL SECURITY,
Defendant.

/

IT IS HEREBY STIPULATED by and between the parties, through their respective undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion for summary judgment is extended to October 14, 2024.

This is a first extension. Plaintiff's counsel is currently working on an opening brief for the Ninth Circuit and has other district court, Appeals Council, and prehearing briefs due in September, plus one district court motion for summary judgment due earlier in October, such that it may not be possible to complete this motion earlier than requested.

Dated: September 46 2024

/s/ Jesse S. Kaplan
JESSE S. KAPLAN
Attorney for Plaintiff

Dated: September 5, 2024

/s/ per e-mail authorization

JUSTIN L. MARTIN
Special Assistant U.S. Attorney
Attorney for Defendant

ORDER

For good cause shown on the basis of this stipulation, the requested extension of plaintiff's time to file plaintiff's motion for summary judgment is extended to October 14, 2024.

SO ORDERED.

DATED: September 6, 2024

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE